



Clean Harbors of Baltimore, Inc.
1910 Russell Street
Baltimore, MD 21230
410.244.8200
www.cleanharbors.com

Via FedEx

February 17, 2014

Mr. Robert G. Heiss, Director
International Compliance Assurance Division
United States Environmental Protection Agency
Ariel Rios Building
Mail Code 2254A, Room Number 6144
1200 Pennsylvania Avenue, NW
Washington, DC 20004

Dear Mr. Heiss:

Pursuant to 40 CFR §262.56 Annual Reports, please find enclosed the Annual Export Report of Hazardous Waste for Clean Harbors of Baltimore, Inc., US EPA ID number MDD 980 555 189 for calendar year 2013.

Should you have any questions concerning this report, please do not hesitate to contact me.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine or imprisonment

Yours truly,

Clean Harbors of Baltimore, Inc.

A handwritten signature in cursive script that reads "Susan Richardson".

Susan Richardson, CHMM
Facility Compliance Manager

cc: Mr. Ed Romeo, CHBI
Mr. Ed Hammerberg, MDE

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Efforts Undertaken to Reduce Volume and Toxicity

Clean Harbors of Baltimore, Inc.
1910 Russell Street
Baltimore, Maryland 21230

Clean Harbors of Baltimore, Inc. (CHBI) is dedicated to the reduction and elimination of waste wherever economically practicable. CHBI has identified the following operational areas of the facility as actual or potential sources of on-site waste generation activity.

Laboratory Operations:

CHBI operates an analytical laboratory used to conduct pre-qualification and conformance testing of candidate waste streams pursuant to the facility's waste analysis plan. The laboratory generates spent solvents, acids, alkalies and other analytical residuals, in addition to accepting generator status of obsolete samples.

On Site Waste Processing Activities:

CHBI accepts wastes from off-site generators for treatment, storage and consolidation prior to transfer to another properly licensed facility. Actual treatment activities conducted at CHBI include supercritical fluid extraction of aqueous waste streams containing organics, inorganic aqueous waste water treatment including chemical precipitation, sludge dewatering and acid/base neutralization, and stabilization of inorganic metal bearing wastes (e.g., soil and sludges contaminated with lead).

The quantity of treatment chemicals used to process a particular waste stream (e.g., for stabilization), as well as the specific method used ("recipe") dictate the overall amount of waste which is generated from treatment activities. Candidate waste streams are first subject to a bench scale treatability evaluation to determine the correct treatment "recipe" in order to determine the most practical and cost effective method which will maximize treatment effectiveness while minimizing the amount of treatment residuals generated.

Releases:

The potential for spills, leaks, or other releases exists as a result of waste management activities. Spills or leaks generally require that additional materials (e.g. absorbents) be added to the released material resulting in an increase in the volume of waste generated. CHBI has a comprehensive facility inspection plan as part of its RCRA facility license. Daily, weekly, monthly, and annual inspections of containers, tanks, process lines, containment dikes, safety equipment and operating procedures ensure that potential problems are proactively identified and corrected. Releases are evaluated to determine why the event occurred, and what corrective actions should be implemented to ensure that a similar release will not reoccur.

Truck-To-Truck Transfers:

CHBI has authorization to conduct truck-to-truck transfer of hazardous waste. This authority results in the reduction of waste which is actually received at the facility. Certain types of waste are shipped directly to that ultimate disposal facility, and are not received at CHBI; instead, the containers of waste are delivered to the facility and transferred among appropriate vehicles without being received and processed (sampled, analyzed). Because CHBI does not take generator status of these wastes, activities such as opening and sampling of containers, analytical conformance testing, and physical transfer of waste through the facility are not conducted. Reduction of these activities in turn effect a direct reduction of on-site waste generation.

From: (410) 244-8200
 Steve Venti
 Clean Harbors of Baltimore, Inc.
 1910 Russell Street

Origin ID: ZFEA



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Baltimore, MD 21230

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